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April 7, 2023

Honorable Joseph H. Rodriguez
United States District Court Judge
District of New Jersey
Mitchell H. Cohen Bldg. & U.S. Courthouse
4th & Cooper Streets
Camden, NJ 08101

Re: United States v. John Grier (21-524)

Dear Judge Rodriguez:

I write to respectfully request an adjournment of the current trial date of May 8, 2023. As the Court and Government are aware, I had a procedure in March of this year and my recovery has been a much slower process than initially anticipated. As a result, my ability to participate in necessary trial preparation has been significantly limited. If the Court can graciously accommodate this request, I would respectfully propose a mid-September trial date. This would allow me the time I need to fully recover, while also allowing my partner, Daniel Holzapfel, Esq., the time to join the defense and get himself up to speed so that he is available to stand in as needed while I continue to heal. This will also ensure that one of us is prepared to proceed on the next scheduled trial date regardless of my medical status.

By way of background, this is my first adjournment request since coming into this matter as co-counsel a few months ago. That said, I understand that the matter has been adjourned on prior occasions and sincerely appreciate Your Honor's time and thoughtful consideration in this regard in light of the circumstances. A proposed form of Order is submitted herewith for Your Honor's review.

Respectfully submitted,

s/ Stacy Biancamano

Stacy Biancamano

Encls.

CC: Jason Richardson, AUSA

Lindsey Harteis, AUSA
Stuart Alterman, Esq.
Daniel Holzapfel, Esq.
John Grier